

JEROME JUNIOR WASHINGTON
PLAINTIFF
v.
C.O. COLGAN et, al.,
DEFENDANTS

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MAR 15 2018

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

PRESONERS COMPLAINT FORM
42 U.S.C. § 1983 AND 28 U.S.C.
§ 1331(a) TO OBTAIN RELIEF FROM
VIOLATION OF FEDERAL LAWS BY
DEMANDED FOR JURY TRIAL

INTRODUCTION:

PLAINTIFF; JEROME JUNIOR WASHINGTON IS THE SWORN PRO-SE LITIGANT ENTITLED THIS HEREBY VERIFIES TESTIMONY OR COMPLAINT. STATED AS FOLLOWED: FOR THE U.S. WESTERN DISTRICT OF PENNSYLVANIA TO HAVE JURISDICTION OVER THIS PRISONERS COMPLAINT FORM. PURSUANT UNDER THE UNITED STATES WESTERN DISTRICT 42 U.S.C. § 1983 AND 28 U.S.C. § 1331(a) TO OBTAIN RELIEF FROM VIOLATIONS OF FEDERAL LAWS. TO THE VIOLATION OF PLAINTIFF 8TH AND 14TH AMENDMENT RIGHTS PURSUANT TO MALICIOUS AND SADISTIC ILL WILL OUT OF RETALIATION. TO VIOLATIONS OF THE PLAINTIFF CONSTITUTIONAL LAW'S OF PRISONERS RIGHTS. TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT. BY C.O. COLGAN INFAMY OF CUSTODY CONTROL WITH IRRATIONAL BRUTALITY. TO CONFIDENT, THE UNWONTON EXISTENCE OF PAIN AND SUFFERING THAT INFECTED THE WONTON HARM FROM DEFENDANT C.O. COLGAN EXCESSIVE FORCE (DC-ADM001) ADMINISTRATIVE POLICY.

i. JURISDICTION

1) PLAINTIFF, JEROME JUNIOR WASHINGTON WAS CONFINED INSIDE THE SCI-GREENE PRISON S.R.T.U. GB-UNIT MENTAL HEALTH PROGRAM, IN PITTSBURGH JAIL OR PENITENTIARY STATE CORRECTIONAL INSTITUTIONS. LOCATION AT SCI-GREENE; 175 PROGRESS DRIVE, WAYNESBURG, PA 15370

2) PLAINTIFF IS AND WAS AT ALL TIMES MENTIONED HEREIN; AN ADULT CITIZEN OF THE UNITED STATES AND A RESIDENT OF THE STATE OF PITTSBURGH, PENNSYLVANIA

ii. DEFENDANT'S JURISDICTION AND VENUE

3) DEFENDANT C.O. COLGAN IS AND WAS AT ALL RELEVANT TIMES HEREIN AN EMPLOYEE/GUARD OF THE PRISON S.R.T.U.-GB UNIT PROGRAM; FOR SCI-GREENE MENTAL HEALTH PATIENTS INCLUDING PLAINTIFF.

4) DEFENDANT SUPERINTENDENT MR. GILMORE WAS AT ALL TIMES HEREIN SUPERINTENDENT OF THE SCI-GREENE; CORRECTIONAL INSTITUTIONS; AS THE WARDEN OF THE MUNICIPAL PRISON FOR CITY OF PITTSBURGH, AS SUPERINTENDENT OF THE PRISON DEFENDANTS; MANAGES ITS DAY TO DAY OPERATIONS AND EXECUTES ITS POLICIES AT ALL RELEVANT TIMES HEREIN PLAINTIFF SRTU GB UNIT PROGRAM COMPLAINT.

5) DEFENDANTS CITY OF PITTSBURGH AND STATE OF PENNSYLVANIA IS AND WAS AT ALL RELEVANT TIMES HEREIN MUNICIPAL CORPORATION OF THE STATE OF PENNSYLVANIA--

6) THIS ACTION ARISES UNDER AND IS BROUGHT PURSUANT TO 42 U.S.C. SECTION 1983 TO REMEDY THE DEPRIVATION; UNDER COLOR OF STATE LAW; OF RIGHTS GUARANTEED BY THE EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION. THIS COURT HAS JURISDICTION OVER THIS ACTION PURSUANT TO 28 U.S.C. SECTION 1331 AND 1333.

7) PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

8) THIS CAUSE OF ACTION ARISES IN THE WESTERN DISTRICT OF PENNSYLVANIA. THEREFORE, VENUE IS PROPER UNDER 28 U.S.C. SECTION 1331(a).

ii. PREVIOUS LAWSUITS OF PLAINTIFF

9) THE PLAINTIFF HAS FILED OTHER LAWSUITS DEALING WITH THESE SAME FACTS INVOLVED INTO THIS ACTION OR COMPLAINT. OTHERWISE RELATING TO PLAINTIFF; JEROME JUNIOR WASHINGTON HV0282 IMPRISONMENT AT SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG, PA 15370

10) THE PLAINTIFF HEREIN HAS FILED THE BELOW SUITS OR INFORMATION AS ISSUED BELOW INTO THE BELIEF OF FILED CIVIL ACTION'S FEDERAL CASE NOTES OR SUITS INVOLVED INTO OTHER CIVIL ACTIONS CASE'S BELOW AS FOLLOW FROM 1 OUT OF 7.

A.) A.) HAVE YOU FILED OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES NO

B.) IF YOUR ANSWER TO(A.) IS YES, DESCRIBE EACH LAWSUIT BY ANSWERING QUESTIONS 1 THROUGH 7 BELOW. (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)

1) PARTIES: TO THE PREVIOUS LAWSUIT;

PLAINTIFF: JEROME WASHINGTON

DEFENDANT: CHRIS. ROTZICK ET, AL;

PAGE 2) COURT IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY; EASTERN DISTRICT OF PENNSYLVANIA
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3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO: 2:14-CV-05561-ER
4) NAME OF JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.
5) APPROXIMATE DATE OF FILING LAWSUIT
6) IS THE CASE STILL PENDING? YES NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ON AN HONORABLE ANSWER OR JUDGMENT OF THE JURISDICTION'S ORDERED ON THE CASE.
C) HAVE YOU FILED LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES NO
D) IF YOUR ANSWER TO (C) IS YES; DESCRIBE EACH LAWSUIT BY ANSWERING QUESTION 1 THROUGH 7 BELOW. (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)
1) PARTIES; TO THE PREVIOUS LAWSUIT;
PLAINTIFF: JEROME WASHINGTON
DEFENDANT: MICHAEL WENEROWICZ et al.
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY: EASTERN DISTRICT COURT.
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 15-4102
4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.
5) APPROXIMATE DATE OF FILING LAWSUIT
6) IS THE CASE STILL PENDING? YES NO
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING FOR AN HONORABLE JUDGMENT FOR JUSTICE

E) 1) PARTIES; TO THE PREVIOUS LAWSUIT:

PLAINTIFF: JEROME WASHINGTON

DEFENDANT: JOHN DOE et, al.,

2) COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY: EASTERN DISTRICT COURT.
3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO. 2:14-CV-05540-ER

4) NAME OF JUDGE ASSIGNED TO YOUR CASE, THE HONORABLE EDUARDO C. ROBRENO, J.

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES NO
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING

F) 1) PARTIES; TO THE PREVIOUS

PLAINTIFF: JEROME JUNIOR WASHINGTON

DEFENDANT: TOM WOLF, et, al.,

2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT, NAME THE COUNTY: WESTERN DISTRICT COURT.
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:16-CV-01714-LPL

4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE MAGISTRATE JUDGE LISA

PUPO LENIHAN

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES NO
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

G) 1) PARTIES; TO THE PREVIOUS

PLAINTIFF: JEROME WASHINGTON

DEFENDANT: Supt. GIUNT et, al.,

2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY: MIDDLE DISTRICT COURT
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO: 1:16-CV-1828

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

H) 1) PARTIES: TO THE PREVIOUS

PLAINTIFF: JEROME JUNIOR WASHINGTON

DEFENDANT: SCI-GREATER FORD SUPERINTENDENT MRS. LANK ET AL;
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; EASTERN
DISTRICT COURT)

3) DOCKET OR INDEX NUMBER: CIVEL ACTION NO. 16-3424

4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE LUCY V. CHEN

5) APPROXIMATE DATE OF FILING LAWSUIT

6) IS THE CASE STILL PENDING? YES NO

7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

II.) THE PLAINTIFF HEREBY TRIED TO EXHAUSTION ALL POSSIBLE REMEDIES THAT WAS OFFERED TO BE ALOUD TO THE PLAINTIFF UPON SCI-GREENE DENIAL OF GRIEVANCE #687587 DECISION STATING: THIS MATTER WAS INVESTIGATED AND REVIEWED BY A HIGHER AUTHORITY. THAT AUTHORITY (OSEE) DID CONCUR WITH THE FINDINGS OF THE INVESTIGATION.; PURSUANT TO PRISONER'S LITIGATION ACT PRESUME HEREIN TO THE DETERMINATION OF FILING PLAINTIFF BEING INDEBTED UNDER THE ADMINISTRATIVE DENIAL GRIEVANCES; OFFERED TO THE FINAL STAGE OF/OR REMEDIES AS MERELY EVERY DAY AN NEW VIOLATION OCCUR WERE TO AN NEW UNLAWFUL UNCONSTITUTIONAL VIOLATION UNDER 13.8.1 POLICY APPEAR TO EXIST MORE AGGRESSIVE AND EXCESSIVE ABUSIVE DISCRETION INTO LONG-TERM ISOLATION INSIDE SCI-GREENE S.R.T.U.-GB UNIT PROGRAM FOR NO FREEDOM UNDER THE SLAVERY ABUSE OF CONTROL ELEMENTS OF ABUSIVE MEASURE OF AUTHORITY POWER OVER INMATES FOR CRUEL AND UNUSUAL PUNISHMENT THROUGHOUT AN CONTINUOUS ARGUABLE CLAIM OF BRUTALITY INFAMY OF/OR EVERY DAY STRUGGLES, PAINS AND SUFFERING UNDER THE MALICIOUS AND SADISTIC MANNER FOR AN SUFFICIENT SUBSTANTIAL RISK OF AN DAILY BASED OF HARM AND DAMAGES UPON LIFE THREATENING DANGEROUS SITUATIONS WERE OF UNLAWFUL HARSHSHIP AS AN D-ROSTER SERIOUSLY MENTAL ILL PLAINTIFF WERE TO UNCONSTITUTIONS EXIST IT MAY DEPEND ON YOUR JURISDICTION TO SET THE SLAVES OR PRISONERS FREE FROM SCI-GREENE S.R.T.U.-GB UNIT PROGRAM CRUEL AND UNUSUAL PUNISHMENT. WHEREAS THE PLAINTIFF IS AN PRISONER THAT IS ASKING TO BE FREE BY THE GRANT TO THE DEMANDS OF AN JURY TRIAL. PRESUMING TO A CONSTITUTIONAL VIOLATION AT LAW OF PLAINTIFF PRISONERS RIGHTS.

V. STATEMENT OF COMPLAINT

12) AT ALL RELEVANT TIMES HEREIN, DEFENDANT'S WERE "PERSONS" FOR PURPOSES OF 42 U.S.C. SECTION 1983 AND ACTED UNDER COLOR OF LAW TO DEPRIVE PLAINTIFF OF THEIR CONSTITUTIONAL RIGHTS, AS SET FORTH MORE FULLY BELOW.

13) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO CHOKE ME MR. WASHINGTON/PLAINTIFF.

14) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO HEADBUTT MR. WASHINGTON/PLAINTIFF IN THE FACE

15) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO ENFORCE HIS WEIGHT DOWNWARDS ON MR. WASHINGTON/PLAINTIFF BODY. WHYLL C.O. COLGAN AGGRESSIVELY TRY TO SNAKE MR. WASHINGTON/PLAINTIFF NECK CONTINUOUSLY!

16) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD SAID WORDS LIKE HE COULDNT WAIT TO FUCK ME UP AND HAD CALLED ME/PLAINTIFF MANY BETCHES AND OTHER ABUSIVE NAMES. AS DEFENDANT C.O. COLGAN HAD BRUTALLY USED EXCESSIVE FORCE UNDER POLICY DC-ADM002. EXCESSIVE FORCE ALLEGATIONS.

PAGE 4 (17.) DEFENDANT C.O. COLGAN HAD SAID WORDS LIKE STOP RESISTING CONTINUALLY TO COVER UP HIS ACTS Case 2:18-cv-00341-JFC Document 7 Filed 04/16/18 Page 4 of 5
COLGAN WAS THE AGGRESSIVE OFFICIAL OUT OF MANY PRISON OFFICIALS BEING PRESENT THROUGHOUT DEFENDANT C.O. COLGAN ABUSIVE ASSAULT ON JULY 13, 2017 DURING 2:00PM TO 4:00PM OF DEFENDANT C.O. COLGAN WORKING ASSIGNMENT HOURS OF 8:00AM TO 4:00PM SHIFT FOR THE SCI-GREENE S.R.T.U. PROGRAM.

18.) DEFENDANT C.O. COLGAN HAD DEPRIVED AWAY NUMEROUS OF PLAINTIFF S.R.T.U. (GB UNIT SITTERS WHENEVER DEFENDANT C.O. COLGAN HAD FELT LIKE REFUSING THE PLAINTIFF SHOWERS.

19.) DEFENDANT C.O. COLGAN DEPRIVE THE PLAINTIFF FOR HIS SHOWER'S ON JUNE 2, 2017 FRIDAY BY PURPOSELY ~~PLATE~~ BYPASSING THE PLAINTIFF IN 9 CELL ON GB UNIT BY STARTING AT GB 08 CELL THEN WENT TO GB 03 CELL.

20.) PLAINTIFF WAS PUNCH BY C.O. COLGAN ON 6-13-17

21.) PLAINTIFF WAS CHOKE BY C.O. COLGAN ON 6-13-17

22.) PLAINTIFF WAS HEADBUTT BY C.O. COLGAN ON 6-13-17

23.) PLAINTIFF FACE WAS SIAMMED OFF THE GROUND BY C.O. COLGAN ON 6-13-17

24.) C.O. COLGAN TRIED SNAPPING THE PLAINTIFF NECK ON 6-13-17

25.) C.O. COLGAN HAD PUT THE WEIGHT OF HIS BODY DOWNWARD ON PLAINTIFF ON 6-13-17

26.) C.O. COLGAN SAID WORDS LIKE HE COULDN'T WAIT TO FUCK ME UP (WHY'll C.O. COLGAN PHYSICALLY BEAT THE PLAINTIFF BRUTALLY ON 6-13-17)

27.) C.O. COLGAN CALLED THE PLAINTIFF MANY BITCHES AND OTHER ABUSIVE WORDS (WHY'll C.O. COLGAN EXCESSIVELY BEAT THE PLAINTIFF UP ON 6-13-17)

28.) DEFENDANT SUPERINTENDENT GILMORE IS HELD ACCOUNTABLE FOR THE SUPERVISOR RULE OVER SCI-GREENE PRISON OFFICIAL'S UNCONSTITUTIONAL VIOLATIONS AS THE WARDEN AND SUPERINTENDENT LIABILITY PROTECTION OVER INMATE AND PRISON OFFICIALS STAFF CARR CUSTODY AND CONTROL.

29.) DEFENDANT SUPERINTENDENT GILMORE THAT WAS INFORMED OR KNOW THE KNOWLEDGE OF SUCH ASSAULT AS OVERALL SUPERVISORY BUT WAS WILLING TO TURN AN EYE TO THE SERIOUS OFFERANCE OF EXCESSIVE FORCE "DC-ADM001" POLICIES, PRACTICES AND PROCEDURAL LAW UNDER GILMORE SUPERVISION

VI. RELIEF AND INJUNCTIONS
VE. RELIEF AND INJUNCTIONS TO REMOVAL DEFENDANT AS FAR AWAY FROM ME AS POSSIBLE.

30.) RELIEF AND INJUNCTION TO REMOVAL DEFENDANT FROM WORKING THE SRTU PROGRAM

31.) RELIEF AND INJUNCTION 13.8.1 SAY'S LESS RESTRAINTS SO PROPERLY REMOVAL ALL OF THESE HANDCUFFS AND SHACKLES AND/OR TREAT THE SRTU LIKE AN MENTAL HEALTH PROGRAM INSTEAD OF ENSLAVERY

32.) RELIEF AND INJUNCTION TO CONDUCT AN INVESTIGATION OF CAMERAS; INMATES AND PROGRAM INSTEAD OF SRTU

33.) RELIEF AND INJUNCTION TO SEE THE WRONG DOING IN THE SRTU PROGRAM ALL PERSONNEL OF THE SRTU PROGRAM

VI. RELIEF
34.) RELIEF PUNITIVE DAMAGES

35.) RELIEF NORMAL DAMAGES

36.) RELIEF COMPENSATION FOR PAIN AND SUFFERING

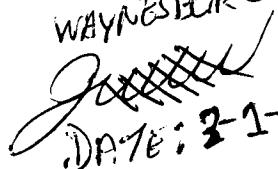
37.) DEFENDANT SUPT. GILMORE SUE IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATION OF PLAINTIFF 8TH AND 14TH AMENDMENT RIGHTS.

38.) DEFENDANT SUPT. GILMORE IS HOUSED AT SCI-GREENE/125 PROGRESS DRIVE, WAYNESBURG PA 15370. NUMBER 724-852-2902/WWW-COR-STATE.PA.US/DEFENDANT IS SUPERINTENDENT/WARDEN OF SCI-GREENE BE REACH MONDAY THROUGH FRIDAY

39.) DEFENDANT C.O. COLGAN IS SUE IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATIONS OF PLAINTIFF 8TH AND 14TH AMENDMENT RIGHTS.

PAGE 5, 40.) DEFENDANT C.W. COLGAN IS ~~S~~ AT SCI-GREENE, 175 PROGRESS DRIVE / WAYNESBURG PA, 15370
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PRISON GUARD AS AN C.O. I
VIA CLAIM FOR RELIEF

41) PLAINTIFF INCORPORATES BY REFERENCE PARAGRAPHS 1 THROUGH 40 OF THIS COMPLAINT
42) THE EIGHTH AMENDMENT, AS APPLIED TO THE STATES BY THE FOURTEENTH AMENDMENT, PROHIBITS
CRUEL AND UNUSUAL PUNISHMENT.
43) DEFENDANT'S POLICIES, PRACTICES AND PROCEDURES SYSTEMATICALLY VIOLATE THE EIGHTH
AMENDMENT RIGHTS OF PRISONERS WITH MENTAL ILLNESS. SUCH POLICIES, PRACTICES AND
PROCEDURES INCLUDE, EXCESSIVE FORCE DANGEROUS ASSAULTIVE AND BATTERY; WITHOUT
LIMITATION IN THE SRTU PROGRAM
44) CONFINEMENT OF PERSONNEL IN SCI-GREENE SRTU PROGRAM WITH MENTAL ILLNESSES
IS JUST LONG TERM EXCESSIVE AND AGGRESSIVE DISCRETION ENFORCEMENT TO AN WORSEN
CONDITION THEN THE R.H.U'S FOR CONDUCT DIRECTLY ATTRIBUTABLE TO DISTRACT AND DESTROY
PLAINTIFF MENTAL ILLNESS.
45) RELIEF; TRAIN STAFF MEMBERS TO ASSIST GUIDE HELP AND BE PATENT WITH SMI INMATES
46) RELIEF; TO ADEQUATE SOCIAL SOCIETY ECONOMY MENTAL HEALTH CARE CONCERN ATTENTION
AND CONSIDERATION TO AN SERIOUS MENTAL HEALTH NEED.
47) RELIEF; CLINICAL AND REHABILITATIVE STAFF UNDER MENTAL HEALTH TREATMENT AND GUIDANCE
PROVIDED THE REQUIRING NEEDS TO BE ASSIGNED PROGRAMMING AT AN MENTAL HEALTH
SRTU PROGRAM WORKING WITH SMI/SD MENTAL ILLNESS PATIENTS
48) RELIEF; CORRECTIONAL OFFICERS WOULD BE TRAINED TO ESCORT AN INMATE WITHOUT SLAVERY
OR SHACKLES AND HANDCUFF AS CONDUCT DAMAGE THE MENTAL CAPACITY TO F-5 INB'CEN'S OF AN CMS 12
MENTAL HEALTH PATIENT; PROVISIONS OF TREATMENT OR SLAVERY
ENDING REPORT
49) A PLAINTIFF SUING UNDER §1983, MUST ALlege TWO "ELEMENTS", THAT SOME PERSON HAS
DEPRIVED HIM OF A FEDERAL RIGHTS "AND THAT "THE PERSON WHO" HAS DEPRIVED HIM OF THAT
RIGHT ACTED UNDER COLOR OF STATE OR TERRITORIAL LAW."
• PLAINTIFF IS HEREBY VERIFYING TO BE THE ABOVE ENTITLED JEROME JUNIOR WASHINGTON UNDER
THE UNITED STATES DECLARED PENALTY OF PERJURY.

JEROME WASHINGTON HV0202
SCI-GREENE
175 PROGRESS DRIVE
WAYNESBURG PA 15370

DATE: 3-1-18